

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

STEPHEN YOUNG; EZEKIEL YOUNG	:	
	:	
Plaintiffs,	:	Civil Action No. 08-4610
	:	
v.	:	
	:	
ST JAMES MANAGEMENT, LLC; STONEHENGE-	:	
WALNUT, LLC; and STONEHENGE ADVISORS, LLC	:	
(DBA) STONGEHENGE-WALNUT)	:	
	:	
Defendants.	:	

**PLAINTIFFS' MOTION IN LIMINE TO EXCLUDE EVIDENCE  
UNDER FEDERAL RULES OF EVIDENCE 401, 402 AND 403**

Plaintiffs, Stephen Young and Ezekiel Young move to exclude the following prior to trial on the bases that the same is either irrelevant or the potential prejudice would outweigh any possible relevance:

1. Any reference to Plaintiff Stephen Young's previous employment history, that is, the name of the employer, rate of pay, length of employment, disciplinary record, work conditions, reason of leaving employment and/or any and all information that may impact the present litigation.
2. Any reference to Plaintiff Stephen Young's post St. James Management employment history, that is, name of the employer, rate of pay, length of employment, disciplinary record, work conditions, reason of leaving employment and/or any and all information that may impact the present litigation.

3. Any reference to the settlement agreement between Plaintiff Stephen Young, Defendant St. James Management and the International Union of Operating Engineers local 835 dated September 9, 2008.

Respectfully submitted,

Dated: May 18, 2010

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Lacy R. Wheeler III, Esquire  
Attorney for Plaintiff  
12 Veterans Square  
Media, PA 19063

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Plaintiffs,	:	Civil Action No. 08-4610
	:	
v.	:	
	:	
ST. JAMES MANAGEMENT, LLC,	:	
STONEHENGE-WALNUT, LLC, and	:	
STONEHENGE ADVISORS, LLC (d.b.a.	:	
STONEHENGE-WALNUT),	:	
	:	
Defendants.	:	

**CERTIFICATE OF SERVICE**

I, Lacy R. Wheeler III, Esquire, hereby certify that on May 18, 2010, I caused a true and correct copy of the foregoing Plaintiff's Motion in Limine and Memorandum of Law to be served on the following via Regular mail:

Gianna M. Karapelou, Esq.  
Klehr, Harrison, Harvey,  
Branzburg  
1835 Market Street  
Philadelphia, Pa 19103

Dated: May 18, 2010

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Lacy R. Wheeler III, Esquire

